

Claims 61-70 are pending in this application, of which Claims 61 and 66 are in independent form.

In the outstanding Office Action, Claims 61-70 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,195,077 (Gyouten et al.) in view of U.S. Patent 5,867,593 (Fukuda et al.).

After carefully studying the Office Action and the prior art, Applicants are firmly of the view that there would in fact have been no motivation for a person of merely ordinary skill in the art to combine the two patents relied on, in such a manner as would have led to the structure respectively recited in Claims 61 and 66, for at least the following reasons.

Independent Claim 61 is directed to a display apparatus that comprises a plurality of column wirings each connected to a respective set of display devices, at least one row wiring connected to the display devices, and a respective pulse width modulator ("PWM") provided for each column wiring. The PWM is for outputting, for each column wiring, a modulation signal having a pulse width determined according to a luminance signal that is to be displayed by a respective one of the display devices. Also, according to Claim 61, each of the PWMs comprises a correction circuit that (1) receives as an input a luminance signal that is to be displayed by the display device corresponding to the column wiring adjacent to the column wiring to which that PWM supplies a modulation signal, (2) compares the luminance signal received as an input with the luminance signal to be displayed by the display device corresponding to the column wiring to which that PWM supplies the modulation signal, and (3) corrects the modulation signal to be supplied from the PWM based on the comparing result.

In the structure recited in Claim 61, therefore, a modulator outputting a modulation signal to each column wiring has a correction function, and compares mutually luminance signals inputted thereto corresponding to two column wirings and corrects the luminance signal based on the comparison result.

Gyouten has been adequately discussed in Applicants' Amendment After Final Action dated January 13, 2003, and it is not believed to be necessary to repeat that discussion.

Fukuda, in contrast to the apparatus of Claim 61, relates to an image region dividing circuit discriminating character portions, picture portions, etc., within an image region. It should be noted the horizontal difference detector 9 shown in Fig. 1 is not connected to, and does not cooperate with, any modulator that outputs a modulation signal to a column wiring, like the PWM recited in Claim 61. Rather, a result of the detection performed by circuit 9 is used in correcting the luminance value. Applicants respectfully point out that even if correction data obtained in this fashion were inputted to a segment driver in the *Gyouten* apparatus (or even to a pulse width modulator in a display device like that of Claim 61), the result would still not provide the advantage afforded by the structure recited in Claim 61, i.e., to avoid the conventional problem illustrated in Figs. 20 and 21 of the present application (distortion of the waveform, induced by crosstalk).

The image region extraction circuitry in *Fukuda*, which includes the horizontal difference detector 9, is quite different from the segment driver of *Gyouten*. Equally importantly, the luminance correction which uses the output from the horizontal difference detector 9 of *Fukuda* is quite different in purpose from correcting an output voltage level (the purpose of the segment driver of *Gyouten*). Applicants therefore cannot

see in what fashion it would have occurred to one of merely ordinary skill to make the proposed combination. Accordingly, Applicants submit that Claim 61 would in fact not have been obvious to one of merely ordinary skill, and submit that the rejection of Claim 61 should be withdrawn.

Independent Claim 66 is similar to Claim 61 in respect of the arguments presented above, and is believed also to be clearly allowable over the art cited against it for those same reasons.

A review of the other art of record has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as references against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or the other of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,


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